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Nathaniel Lichfield
& Partners
Planning, Design, Economics.

Kathryn Moran
Regeneration and Planning
5 Pancras Square
London
N1C 4AG

14 Regent's Wharf
All Saints Street
London N1 9RL
020 7837 4477
london@nlpplanning.com
nlpplanning.com

Date 30 September 2015
Our ref DEPARTMENTAL/MH/OW/9854472v1
Your ref

Dear Ms Moran

Planning application ref: 2015/4396/P - 152 Royal College Street - Letter of Objection

On behalf of the freehold owner of Bruges Place, Baynes Street, Camden we write to register their objection to the proposed development at 152 Royal College Street (Ref: 2015/4396/P). The reasons for objecting are set out below.

These representations are made with full regard for the Development Plan for this site, which consists of The London Plan, Camden's Core Strategy (2010), Camden Development Policies (2010) and Camden Site Allocations (2013). The following has also been drafted with regard to the National Planning Policy Framework (2012) as well Camden Planning Guidance (2014) and the Camden Broadway Conservation Area Appraisal.

Design and Conservation:

The site is located within the Camden Broadway Conservation Area, the merits of which are set out in detail within the objection made by the CAAC and will not be repeated here.

Based on our own review of the design proposals we consider that the proposed scheme would evidently not be in keeping with the immediate character of this area which, retains a number of strong defining characteristics that these proposals have little regard to.

The adjoining terrace properties, no. 154 and no. 156 are in our view 'positive contributors' to the Conservation Area and it is from these two properties that the proposed scheme should, we believe, take its cue. Indeed we note that it was with reference to these neighbouring properties that an Inspector dismissed an appeal at the same site earlier this year (APP/X5210/A/2229005) finding that proposals would "cause material harm to the character and appearance of the Conservation Area".

The current proposal would be a part storey taller than the neighbouring properties introducing an angled roof line from which there appears no design rationale when compared with the

Nathaniel Lichfield & Partners Limited
14 Regent's Wharf
All Saints Street
London N1 9RL

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neighbouring properties which, as noted by the inspector, "have a strong, unaltered parapet roofline". The proposed roof line has no regard to the form of the immediate buildings and as a result would detract from the Conservation Area.

Similarly, there is no reference point for the extended chimney structure, this is unnecessary visually damaging clutter.

The same could be said for the proposed depth of the property, which at ground floor and first floor would extend to the rear boundary significantly beyond the rear building line of no's. 154 and 156.

The proposal has no regard for the proportions of its neighbouring buildings, seeking to maximise development on the site rather than sit comfortably and appropriately within the immediate context. The additional bulk and mass to the rear would also have an unacceptable impact on the outlook of future residents of Bruges Place and lead to a sense of enclosure.

The design of the front elevation also has little regard to the character of the Conservation Area. In particular, the proposed shop front would detract from the neighbouring shop frontages which are identified as being good examples of surviving historic shopfronts in this conservation area by the Conservation Area Appraisal.

The building is on a corner plot which is highly visible in the Conservation Area, it is therefore important that the proposals enhance both the site but also the conservation area as a whole and are in keeping with the character of the area. This scheme does not. The proposals are, in respect to the above, contrary to Camden's Development Policies DP24 and DP25.

Daylight & Sunlight

The Daylight & Sunlight report fails to take full account of the future use of Bruges Place. The development of the first floor as residential use under permitted development rights is now almost complete. The Daylight & Sunlight report acknowledges that the use of Bruges Place will change (i.e. based on researching planning history) but uses the office layout for the basis of the analysis. The permitted development rights were prior approved under application ref: 2014/4321/P. As part of the application, plans were submitted showing the proposed layout of residential units and these are in the public domain. Therefore the consultants should be fully aware of the proposed layouts and should have tested the scheme on this basis. The daylight distribution results will, no doubt, be quite different and the modelling should be run again.

Failure to properly assess the daylight & sunlight impacts of the proposed development means it cannot be fully appraised against Development Policy DP26.

Work and living standards

It is not clear how the basement commercial space would receive adequate natural daylight and ventilation. If mechanical systems are proposed then details should be provided as to where plant machinery will be located. Plant could have amenity issues for neighbouring properties as well as for the proposed occupiers of the new unit in terms of visual impact and noise and should be considered now, rather than reserved for planning condition.

The bedroom at ground floor does not appear to have any natural light nor is it clear how it relates to the rest of the development. A bedroom positioned to the rear of a shop behind a goods lift and next to a wheelchair platform lift would not be afforded any level of amenity. It appears as though



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the bedroom would actually be used by the shop/office. It suggests that the retail unit is a live work unit. Indeed the Design and Access Statement suggests the proposals are for a three bedroom unit, whereas in total four bedrooms are shown.

The proposals would result in substandard living and work place accommodation and would therefore be contrary to Development Policies DP24 and DP28.

Amenity

The green roof area to the rear would need to be accessible for maintenance purposes. As a result, it could be accessed for recreational reasons also i.e. parties. As it is a private dwelling there is no means by which to control this. If it is used in this manner it would have significant amenity impacts in terms of noise, disturbance and overlooking for future occupiers of Bruges Place. This would be contrary to Development Policy DP26.

Construction and Servicing

The failure to provide a Construction Management Plan for the development, which includes a basement, means the true impact of the development on neighbouring properties cannot be fully considered.

Furthermore, the lack of detail in respect of servicing, given that a new access point from a side road is proposed, means that the operational elements of the commercial proposals cannot be fully considered against Development Policy DP20.

The Basement Impact Assessment does not consider the impacts of the development in line with Camden Planning Guidance 4 (as recently amended). For example, there is limited analysis of Ground Movement and no indication of the likely Burland Scale of movement. We would expect these details to be available prior to any decision being made. Without more detailed evidence the proposals cannot be considered against Development Policies DP27 or CPG 4.

Summary

The proposals being considered at 152 Royal College Street would have an unacceptable impact on neighbouring properties and residents as well as providing substandard accommodation for future residential and commercial occupiers.

Furthermore, by virtue of the design, bulk and scale the proposals would amount to inappropriate development in the Conservation Area which would cause harm to the heritage asset not outweighed by any clear public benefit. As such, when reviewed against Paragraph 134 of the National Planning Policy Framework, planning permission should not be approved.

We trust the above is clear, however should you have any questions in respect to this objection please do not hesitate to contact me.

Yours sincerely

A black rectangular box redacting the signature of the sender.

Owain Nedin
Senior Planner